



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

September 10, 2007

Mr. Lonnie Monaco
Engineering Field Activity Northeast, Naval Facilities Engineering Command
Code 1821/LM, 10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Revised Letter Work Plan – Site 9 Soil Removal Action

Dear Mr. Monaco:

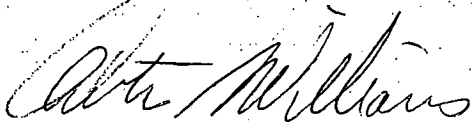
EPA has completed its review of the Navy's August 22, 2007 responses to EPA's comments on the above referenced document dated July 9, 2007. EPA requests that the Navy provide clarification and/or revise the work plan accordingly based on the identified issues listed below:

1. Table 1 in the August LWP indicates that composite TCLP soil samples will be used for the VOC analysis for the ASH & CDD. Previous discussions between EPA, MEDEP and Navy agreed that the Navy should not conduct VOC analysis of TCLP samples because the Ash and CDD samples were being composited in the field. Rather, it was agreed that the individual samples would be sent to the analytical laboratory and composited there followed by methanol extraction and analyzed by Method 8260. Please revise Table 1 to reflect previous NASB cleanup team agreements.
2. The Navy has responded that contaminated ash/soil/hazardous waste will be removed to a level that meets ARARs for the site to the extent practicable. This suggests that ARARs might not be satisfied for some contaminated material left at the site. Should this occur, it appears that the Navy's intent, per the note for Table C-2, is to develop site-specific PRGs for the risk assessment prepared as part of the RI/FS process. If this is not the case, please edit the work plan to clarify the intent. However, EPA strongly believes it would be in the Navy's best long-term interest that it ensure that all remaining soils left on the site attain Table C-2 ARARs upon completion of removal activities. Removing materials down to these levels will greatly facilitate and accelerate final site closure and minimize the Navy's long-term environmental management commitment to the site. EPA encourages the Navy to seriously consider this recommendation and revise the work plan accordingly. It is also critical that all removal action documentation and supporting laboratory analytical data are sufficient to demonstrate successful achievement of the PRGs.

3. Figure 3: MEDEP and EPA is requiring the Navy to manage as hazardous waste any ash that has contacted or commingled with the hazardous waste. As the Navy may be aware, ash is not considered soil for the purposes of decision-making related to land disposal restrictions. Consequently, ash that is classified as hazardous will have to achieve the universal treatment standards (UTS) of 40 CFR 268.48 (i.e., lead TCLP must be less than 0.75 mg/L) prior to land disposal. Soil on the other hand only needs to achieve ten times UTS (i.e., lead TCLP must be less than 7.5 mg/L) in accordance with 40 CFR 268.49. In addition, although the ash that contacted or commingled with the hazardous waste will be disposed at a RCRA C facility per the EPA and State's request, it is likely that a disposal facility would not accept the ash as hazardous waste without comprehensive analytical characterization.
4. Table C-2: The Navy replied that Table C-2 will be used for all materials remaining at the site; however, EPA notes that the PQLs provided in Table C-2 are based on low level sampling methods. If high level sampling methods (methanol preservation) are used PQLs may result that exceed the cleanup goals proposed in Table C-2 for some analytes. If this should occur, re-sampling using the low level sampling method would be required to demonstrate compliance with the cleanup goals. The Navy should plan the sampling methods accordingly to avoid generating data that is unusable for decision making.

Should you have any questions with regard to this letter, please feel free to contact me at (617) 918-1384.

Sincerely,



Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

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